UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

DMITRIY SHIROKOV, on behalf of himself and all others similarly situated)))
Plaintiff,))
V.) Case: 1:10-cv-12043-GAO
)
DUNLAP, GRUBB & WEAVER, PLLC; US)
COPYRIGHT GROUP; THOMAS DUNLAP;)
NICHOLAS KURTZ; GUARDALEY, LIMITED;)
and ACHTE/NEUNTE Boll Kino)
Beteiligungs Gmbh & Co KG,)
)
Defendants.)
)

PARTIALLY ASSENTED-TO MOTION FOR ENTRY OF PROTECTIVE ORDER

Defendants Dunlap, Grubb & Weaver, PLLC, US Copyright Group, Thomas Dunlap, and Nicholas Kurtz move this Court to enter the proposed Protective Order, attached as Exhibit A. Plaintiff Dmitry Shirokov has assented to the entry of the proposed Protective Order. Counsel for defendant Achte/Neunte Boll Kino Beteilingungs Gmbh & Co KG have indicated that they do not have authority to assent to this motion.

As grounds for the entry of this proposed Protective Order, the parties state that they anticipate that the litigation of this matter will require the disclosure and/or exchange of information that may be subject to the attorney-client privilege, or that that is otherwise treated as confidential by the parties. The proposed Protective Order is designed to facilitate the disclosure and/or exchange of such information to the parties and the Court.

In compliance with Local Rule 7.2(e), the proposed Protective Order expressly provides that any document proposed to be filed under seal may only be so filed after allowance in advance of a motion to file under seal and does not include a blanket order authorizing filing of confidential information under seal.

WHEREFORE, Dunlap, Grubb & Weaver, PLLC, US Copyright Group, Thomas Dunlap, and Nicholas Kurtz, with the assent of the plaintiff, respectfully request that this Court enter the proposed Protective Order attached hereto as Exhibit A.

Respectfully submitted,

The Defendants, Dunlap, Grubb & Weaver, PLLC, US Copyright Group, Thomas Dunlap, and Nicholas Kurtz

By their counsel,

/s/ Kara Thorvaldsen
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Assented to:	

Plaintiff, Dmitriy Shirokov

By his Attorneys,

/s/ Jason E. Sweet _

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Certificate of Service

I, Kara Thorvaldsen, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). I am not aware of any party who is a non registered participant, and therefore electronic filing is the sole means of service of this document.

/s/ Kara Thorvaldsen